

The Honorable Robert S. Lasnik

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

BRUCE KEITHLY; DONOVAN LEE; and
EDITH ANNA CRAMER, individually and
on behalf of all others similarly situated,

Plaintiffs,

V.

INTELIUS, INC. et al.,

Defendants.

Case No: 09-cv-01485-RSL

**SUPPLEMENT TO MOTION OF
LAURENCE D. PASKOWITZ TO
CONSOLIDATE RELATED
ACTIONS AND FOR
APPOINTMENT OF LEAD
PLAINTIFF AND LEAD
COUNSEL**

**NOTE ON MOTION CALENDAR:
June 18, 2010**

AND RELATED CASES

Plaintiff Laurence D. Paskowitz (“Paskowitz”) has moved for an Order: (a) consolidating the three above-captioned related class action cases involving alleged misconduct by defendant Intelius, Inc. (“Intelius”) and others acting in concert with it; (b) appointing Paskowitz as lead plaintiff for these actions; and (c) appointing his counsel as lead counsel (or, alternatively, as one of no more than two co-lead counsel) (the “Motion”) (Dkt. No. 60).

At the time of the Motion, Counsel was unaware of the Court’s May 28, 2010 Order appointing the firms of Cohen Milstein Sellers & Toll P.L.L.C. and Keller Rohrback L.L.P as lead counsel and their clients as lead plaintiffs. The issues raised by Plaintiff Paskowitz’s Motion indicate that the current lead status be re-examined in light

1 of the significant issues raised in the Motion and the claims asserted in the Paskowitz
 2 Complaint which were never asserted by current counsel.

3 Accordingly, Plaintiff Paskowitz respectfully requests that the Motion be
 4 considered as a request for reassessment of the current lead counsel and lead plaintiff
 5 appointments and for a modification of the May 28, 2010 Order.

6 In the alternative, should the Motion not be granted, Paskowitz respectfully
 7 requests that the Court treat the Motion as a request for Intervention as of right pursuant
 8 to Rule 24(a) of the Federal Rules of Civil Procedure. Paskowitz relies on his Complaint
 9 as the Complaint in Intervention.

10 Dated this 4th day of June, 2010.

11 Respectfully Submitted,

12 By:

13 
 14 Derek Linke, WSBA No. 38314
 15 John Du Wors, WSBA No. 33987
 16 **NEWMAN & NEWMAN,**
ATTORNEYS AT LAW, LLP
 17 505 Fifth Avenue South, Suite 610
 18 Seattle, WA 98104
 19 Telephone: (206) 274-2800
 20 Facsimile: (206) 274-2801
 21 Email: linke@newmanlaw.com
 22 Email: duwors@newmanlaw.com

23 Brian M. Felgoise (*pro hac vice* to be filed)
FELGOISE LAW FIRM
 24 261 Old York Rd. Suite 518
 25 Jenkintown, PA 19046
 26 Telephone: (215) 886-1900
 27 Facsimile: (215) 886-1909
 28 Email: felgoiselaw@verizon.net

29 Roy Jacobs (*pro hac vice* to be filed)
ROY JACOBS & ASSOCIATES
 30 One Grand Central Place
 31 60 East 42nd Street 46th Floor
 32 New York, NY 10165
 33 Telephone: (212) 867-1156
 34 Facsimile: (212) 504-8343
 35 Email: rjacobs@jacobsclasslaw.com